

# **Exhibit C**

### Traders Penalized by CFTC for Spoofing Activity

	Trader	Facts
1	Randy Chen	“Chen engaged in this pattern on over 1,000 separate occasions[.]” <i>In re Randy Chen</i> , CFTC Dkt. No. 22-35 at 2 (Sept. 26, 2022).
2	Eric Schwartz	“Schwartz engaged in multiple instances of the disruptive trading practice known as ‘spoofing[.]’” <i>In re Eric Schwartz</i> , CFTC Dkt. No. 22-22 at 2 (Aug. 24, 2022)
3	Roman Banoczay Jr.	Banoczay, Jr. “engaged in approximately 2,000 distinct spoofing events[] . . . encompass[ing] more than 19,000 individual spoof orders.” <i>CFTC v. Banoczay</i> , 20-cv-5777, ECF No. 50 at 11 (N.D. Ill. Dec. 7, 2021).
4	Brendan Delovitch	“Delovitch engaged in multiple instances of the disruptive trading practice known as ‘spoofing[.]’” <i>In re Brendan Delovitch</i> , CFTC Dkt. No. 20-71 at 2 (Sept. 30, 2020).
5	Wesley Johnson	“Johnson engaged in multiple instances of the disruptive trading practice known as ‘spoofing[.]’” <i>In re Wesley Johnson</i> , CFTC Dkt. No. 20-72 at 2 (Sept. 30, 2020).
6	Rajeev Kansal	“Kansal engaged in multiple instances of the disruptive trading practice known as ‘spoofing[.]’” <i>In re Rajeev Kansal</i> , CFTC Dkt. No. 20-73 at 2 (Sept. 30, 2020).  “After being notified by the Commission’s Division of Enforcement of an investigation into his trading activity in cotton futures, Kansal engaged in similar trading activity in sugar futures[.]” <i>Id.</i>
7	Thomas Donino	“Donino engaged in multiple instances of the disruptive trading practice known as ‘spoofing[.]’” <i>In re Thomas Donino</i> , CFTC Dkt. No. 20-68 at 2 (Sept. 28, 2020).
8	Igor Chernomzav	“From March 2014 through March 2015, Chemomzav engaged in manipulative or deceptive acts, including ‘spoofing’ . . . on more than a thousand occasions[.]” <i>In re Igor Chernomzav</i> , CFTC Dkt. No. 19-31 at 2 (Sept. 30, 2019).
9	John Lawrence	“Between May 2017 and October 2017, Lawrence engaged in spoofing . . . on a small number of isolated occasions. Beginning in October 2017, Lawrence intensified his spoofing activity. By January 2018, Lawrence had placed hundreds of Spoof Orders[.]” <i>In re John Lawrence</i> , CFTC Dkt. No. 19-27 at 2 (Sept. 16, 2019).
10	Benjamin Cox	“[F]rom April 2014 through[] at least[] February 2018, [Cox] . . . engaged in multiple instances of the disruptive trading practice known as ‘spoofing[.]’” <i>In re Benjamin Cox</i> , CFTC Dkt. No. 19-18 at 1–2 (July 31, 2019).

	Trader	Facts
11	Kevin Crepeau	“[F]rom in or about August 2013 to at least June 2016[,] [Crepeau] . . . engaged in numerous instances of the disruptive trading practice known as ‘spoofing[.]’” <i>In re Kevin Crepeau</i> , CFTC Dkt. No. 19-05 at 1–2. (Jan. 31, 2019).
12	Michael D. Franko	“From at least May 2013 to July 2014[,] . . . on an almost daily basis, Franko [spoofed].” <i>In re Michael D. Franko</i> , CFTC Dkt. No. 18-35 at 2. (Sept. 19, 2018).
13	Anuj C. Singhal	“Between at least March and June 2016[,] . . . Singhal engaged in multiple instances of the disruptive trade practice of ‘spoofing[.]’” <i>In re Anuj C. Singhal</i> , CFTC Dkt. No. 18-11 at 2 (Apr. 9, 2018).
14	Simon Posen	“During the period December 2011 through March 2015, . . . Posen deployed [a] spoofing strategy on thousands of occasions[.]” <i>In re Simon Posen</i> , CFTC Dkt. No. 17-20 at 2 (July 26, 2017).
15	Jeremy Lao	“From at least July 16, 2011 through 2012, . . . approximately eighty times[,] Lao [engaged in spoofing]. . . . In or around 2012, Lao engaged in the trading strategy . . . in conjunction with a more senior trader.” CFTC Non-Prosecution Agreement with Jeremy Lao at 7 (June 28, 2017), <a href="https://www.cftc.gov/sites/default/files/idc/groups/public/@lrenforcementactions/documents/legalpleading/enfnonprosecutionlao062917.pdf">https://www.cftc.gov/sites/default/files/idc/groups/public/@lrenforcementactions/documents/legalpleading/enfnonprosecutionlao062917.pdf</a> .
16	Daniel Liao	“From at least December 2011 through January 2012, on approximately 30 occasions, Liao [engaged in spoofing].” CFTC Non-Prosecution Agreement with Daniel Liao at 7 (June 28, 2017), <a href="https://www.cftc.gov/sites/default/files/idc/groups/public/@lrenforcementactions/documents/legalpleading/enfnonprosecutionliao062917.pdf">https://www.cftc.gov/sites/default/files/idc/groups/public/@lrenforcementactions/documents/legalpleading/enfnonprosecutionliao062917.pdf</a> .
17	Shlomo Salant	“From at least July 16, 2011 through 2012, . . . approximately 35 times[,] . . . Salant [engaged in spoofing]” CFTC Non-Prosecution Agreement with Shlomo Salant at 7 (June 28, 2017), <a href="https://www.cftc.gov/sites/default/files/idc/groups/public/@lrenforcementactions/documents/legalpleading/enfnonprosecutionsalant062917.pdf">https://www.cftc.gov/sites/default/files/idc/groups/public/@lrenforcementactions/documents/legalpleading/enfnonprosecutionsalant062917.pdf</a> .
18	Jonathan Brims	“[F]rom at least July 16, 2011 through December 31, 2012[,] [Brims placed] . . . more than one thousand [spoof] orders[.]” <i>In re Jonathan Brims</i> , CFTC Dkt. No. 17-13 at 1–2 (Mar. 30, 2017). “[A]t times, Brims [also] coordinated with one or more other traders [to spoof.]” <i>Id.</i> at 2.
19	Stephen Gola	“[F]rom at least July 16, 2011 through December 31, 2012[,] [Gola placed] . . . more than one thousand [spoof] orders[.]” <i>In re Stephen Gola</i> , CFTC Dkt. No. 17-12 at 1–2 (Mar. 30, 2017). “[A]t times, Gola [also] coordinated with one or more other traders [to spoof.]” <i>Id.</i> at 2.
20	Igor B. Oystacher	“Oystacher and 3 Red engaged in these manipulative and deceptive ‘flips’ during the relevant period and at least 1316 times . . . and in the process placed thousands of spoof orders.” Complaint at 15, <i>CFTC v. Oystacher</i> , 15-cv-9196, ECF No. 1 (N.D. Ill. Oct. 19, 2015).

	Trader	Facts
21 & 22	Heet Khara Nasim Salim	“Between February 2015 and April 28, 2015, [Khara and Salim spoofed].” <i>CFTC v. Khara et al.</i> , 15-cv-3497, ECF No. 35 at 6 (S.D.N.Y. Mar. 31, 2016).
23	Eric Moncada	Moncada spoofed on various days in October 2009. <i>CFTC v. Moncada</i> , 12-cv-8791, ECF No. 80 at 5 (S.D.N.Y. Oct. 1, 2014).